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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

11 IN RE: UBER TECHNOLOGIES, INC.
12 PASSENGER SEXUAL ASSAULT
13 LITIGATION

Case No. 23-md-03084-CRB

Honorable Charles R. Breyer

14 This Document Relates to:

15 *Jaylynn Dean v. Uber Technologies, Inc., et al.*,
16 CV-25-4276-PHX-CRB

**DECLARATION OF MAYA R. KALONIA IN
SUPPORT OF PLAINTIFFS'
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF
DEFENDANTS' RULE 702 MOTIONS**

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18 I, Maya R. Kalonia, declare:

19 1. I am an attorney in the law firm of Girard Sharp, LLP, and counsel for Plaintiffs in the
20 above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to
21 practice before this Court. I make this declaration based on my own personal knowledge. If called upon to
22 testify, I could and would testify competently to the truth of the matters stated herein. I respectfully submit
23 this declaration in support of Plaintiffs' Administrative Motion to File Under Seal Portions of Defendants'
24 702 Motions.

25 2. I have reviewed Exhibits 1, 2, and 6 to Defendants' Motion to Exclude Opinions of
26 Plaintiffs' Expert Dr. John Chandler ("Chandler Exhibit(s)") that were filed at ECF Nos. 4342, 4342-1, and
27 4342-5.
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3. I have reviewed Exhibit 1 to Defendants' Motion to Exclude Opinions of Plaintiffs' Expert Lacey Keller ("Keller Exhibit") that was filed at ECF 4338.

4. I have reviewed Exhibit 1 to Defendants' Motion to Exclude Opinions of Plaintiffs' Expert Thomas R. Tremblay ("Tremblay Exhibit") that was filed at ECF 4350.

5. Chandler Exhibit 1 includes the name of Wave 1 Bellwether Plaintiffs B.L., LCHB128, A.R.2, and WHB 832.

6. Chandler Exhibit 2 includes the name of Wave 1 Bellwether Plaintiff LCHB128.

7. Chandler Exhibit 6 includes the names of Wave 1 Bellwether Plaintiffs LCHB128, A.R.2, and WHB 832.

8. Keller Exhibit 1 includes the names of Wave 1 Bellwether Plaintiffs B.L., LCHB128, A.R.2, and WHB 832.

9. Wave 1 Bellwether Plaintiffs B.L., LCHB128, A.R.2, and WHB 832 wish to continue proceeding anonymously under their respective pseudonyms.

10. Tremblay Exhibit 1 includes the name of third-party JW and the address of third-party SM. On information and belief, SM's address is not publicly available. The Exhibit also includes the private medical information of Plaintiff Jaylynn Dean and sensitive information regarding SM's private life.

11. The significant privacy concerns of Plaintiffs and third parties outweigh any minimal public interest in disclosure of their identities or highly sensitive information. The public's interest in the case may be satisfied without revealing this information.

12. The highly sensitive medical information of Jaylynn Dean and personal information regarding SM's private life typify the type of information that may be used by a third party to gratify private spite, promote scandal, or circulate libel.

13. The disclosure of personally identifiable and highly sensitive private information would harm Wave 1 Bellwether Plaintiffs Jaylynn Dean, LCHB128, B.L., A.R.2, and WHB 832, and third parties' legitimate privacy interests. Plaintiffs' request is narrowly tailored to sealing only PII and sensitive personal information. There is no less restrictive alternative to sealing portions of the relevant

1 materials that would protect the legitimate privacy interests of Plaintiffs and third parties, as describing
2 the information would reveal its contents.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed on November 24, 2025 in Oakland, California.

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6 /s/ Maya R. Kalonia

7 Maya R. Kalonia
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